

**SUPPRESSED**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. )  
SEAN MCCHORD O'DONNELL, )  
Defendant. )

No.

**4:17CR00359 AGF/PLC**

*FILED  
AUG - 9 2017  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS*

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

Between November 2016, and January 2017, in St. Louis County, Missouri and St. Louis, Missouri, within the Eastern District of Missouri, the defendant,

**Sean McChord O'Donnell,**

the defendant herein, in or affecting interstate commerce, did knowingly recruit, entice, obtain, advertise, maintain, patronize or solicit by any means a person, Jane Doe, knowing, or in reckless disregard that Jane Doe had not obtained the age of 18 years, and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a).

**COUNT II**

The Grand Jury further charges that:

Between November 2016, and January 2017, in St. Louis County, Missouri and St. Louis, Missouri, within the Eastern District of Missouri, the defendant,

**Sean McChord O'Donnell,**

the defendant herein, did use facilities of interstate commerce, namely cellular telephones and the internet, with the intent to promote, manage, establish, and carrying on of an unlawful activity, that is prostitution, and thereafter, performed an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3).

A TRUE BILL.

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FOREPERSON

CARRIE COSTANTIN  
Acting United States Attorney

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HOWARD J. MARCUS  
Assistant United States Attorney